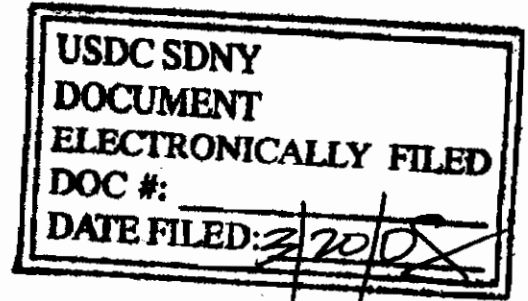


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Donald E. Maher, Esq.

VIA EMAIL AND BY HAND

March 18, 2008

Richard J. Sullivan, D. J.
United States District Judge
Southern District of New York
500 Pearl Street, Room 615
New York, New York 10007

Re: Local 215, DC 1707, AFSCME v.
Paul J. Cooper Center for Human Services
Case No. 07 CV 10487 (RJS) (RLE)

Dear Judge Sullivan:

This firm represents Paul J. Cooper Center for Human Services Inc., the Defendant in the above referenced matter.

In the later part of the afternoon on March 17th, your March 14th order was electronically filed. That order scheduled a pre-motion conference on March 28th and provided that Plaintiff's counsel file a three page re motion letter by March 20th. That order also directed that I file a response to that letter by March 25th.

I am writing to request an extension of the time period for my response. At a minimum, I would ask that I be permitted to provide my response by March 27th. The reason for this request is that the entire time period for me to review Plaintiff's counsel's submission and prepare my response falls at the very height of Christian Holy week, that being Good Friday and the ensuing Easter Holiday weekend.

Due to both religious observation reasons and family obligations (including child care obligations), I will be out of the office from Friday, March 21st through Easter Monday, March 24th. I will not be back in the office until Tuesday, March 25th and would like to receive the same three-day time period (that is being afforded to Plaintiff's counsel) afforded to me to prepare my response.

I would also ask that the Court move the March 28th conference into the following week, so that the Court has some meaningful time period to consider my response. Should the Court move the conference into the following week, please know that I have medical appointments scheduled for Tuesday, April 2nd and Friday April 4th.

As this is the first "pre-motion" conference, there have been no prior requests for an adjournment, although each counsel has each made one request for adjournment of the earlier "initial case management" conferences. Of course it was the Court itself that cancelled last Friday's conference. I have contacted Plaintiff's counsel who has provided no response to my extension and adjournment requests.

Thank you for the courtesy extended and for your time and attention to this matter. Please know that should you wish to reach me by telephone, I am best reachable on my cell phone at 610-763-0594.

Respectfully submitted,

s/s

Donald E. Maher

Cc: Thomas M. Murray, Esq. (via email)

Defendant's request for an extension of time in which to file the response to the pre-motion letter is granted. Defendant shall file his letter by March 27, 2008. The pre-motion conference is adjourned to ~~Wednesday April 2, 2008~~ Thursday April 3, 2008 at Noon.

SO ORDERED

3/19/08

